

4. Pursuant to Iowa Code § 505.28, Respondent consented to the jurisdiction of the Commissioner of Insurance by committing acts governed by Iowa Code chapter 522B.

5. From on or about March 31, 2023, to present, Rodriguez engaged in acts and practices within the state of Iowa constituting cause for probation, suspension, or revocation of her insurance producer license; cease and desist orders; and civil penalties or other relief under Iowa Code chapters 505, 522B, and rules adopted pursuant to these chapters.

II. FACTUAL ALLEGATIONS

6. Rodriguez applied for a nonresident insurance producer license with the Division by submitting through the National Insurance Producer Registry a Uniform Application for Individual Producer License (“Uniform Application”). In submitting the Uniform Application, Rodriguez designated the Commissioner as an agent for service of process.

7. Laura Rodriguez (“Rodriguez”) is an individual with a last-known residence address 8608 Verona Ct., Tampa, Florida 33634.

8. The Division issued Rodriguez a license as a nonresident insurance producer on September 16, 2021, and assigned to Rodriguez National Producer Number 20029217.

9. At all times relevant hereto, Rodriguez was a contracted agent with CHA HMO, Inc., a subsidiary of Humana Insurance Company (“Humana”), until Humana terminated her contract on September 20, 2023.

10. On March 31, 2023, Rodriguez called Humana customer J.G., a New Mexico resident, stating that Humana was making a courtesy call to review the benefits of J.G.’s policy. Rodriguez stated that J.G. had been updated to an HMO plan, but that she would “update” J.G.’s plan to a PPO plan. Rodriguez told J.G. that Humana would be sending her a new health insurance card, and that the benefits of the PPO plan would begin the following day, April 1,

2023. At no point during their conversation did Rodriguez explain that this was a total replacement of health insurance involving the purchase of new health insurance coverage. Rodriguez did not explain that she would be submitting an application for insurance on J.G.'s behalf. Rodriguez did not request nor obtain J.G.'s permission to file an insurance application on her behalf. Rodriguez did not request nor obtain J.G.'s permission to apply electronic signatures on her behalf.

11. Following her conversation with J.G., Rodriguez completed and submitted an application for a HumanaChoice PPO insurance plan on J.G.'s behalf. Rodriguez applied an electronic signature for J.G. on the application. Humana thereafter issued the policy to J.G.

12. On March 23, 2023, J.G. submitted a complaint to Humana, complaining that Rodriguez signed her up for a policy without her consent.

13. On May 17, 2023, Humana began investigating J.G.'s complaint. On May 30, 2023, Humana sent Rodriguez a request to provide a statement regarding the conduct at issue. After receiving no response, Humana resent the request on June 8, 2023, and again on June 19, 2023. On June 20, 2023, Rodriguez provided the requested agent statement. In her statement, Rodriguez claimed that J.G. initiated the call, that J.G. completed her enrollment electronically, and that J.G. provided a telephonic signature for the application during the telephone call.

14. The March telephone call was recorded. On the recording, Rodriguez initiates the call, not J.G., no enrollment was completed by J.G., and signatures were never discussed during the conversation.

15. On September 20, 2023, Humana terminated its contract with Rodriguez.

16. Humana rescinded the policy issued to J.G. and did not charge J.G. a premium.

Division Investigation

17. On October 4, 2023, Humana notified the Division of its decision to terminate Rodriguez for cause.

18. On October 9, 2023, a Division investigator sent Rodriguez a Request for Information letter (“RFI”) and Termination for Cause Questionnaire (“TFC”) to Rodriguez via email, at the email address listed in the Division’s licensing records as well as the email address listed in Florida’s licensing records for Rodriguez. The RFI and TFC requested a response on or before October 19, 2023. The Division did not receive any indication that the emails failed to be delivered. Rodriguez did not provide a response on or before October 19, 2023.

19. On October 19, 2023, the Division investigator sent a second RFI and TFC to Rodriguez via FedEx to the residence address listed in the Division’s licensing records as well as a different residence address that was listed in Florida’s licensing records for Rodriguez. This second RFI and TFC requested a response on or before October 29, 2023.

20. On October 26, 2023, FedEx successfully delivered the Division’s second RFI and TFC sent to the residence address listed in Florida’s licensing records for Rodriguez. After FedEx unsuccessfully attempted delivery at Rodriguez’s Florida residence address, FedEx delivered the package to a nearby address, 6503 W. Waters Ave Tampa, FL 33634, the site of a Walgreen’s Pharmacy, at Rodriguez’s request. The FedEx delivery confirmation indicates that the package was signed for by “L. Rodriguez.”

21. On October 30, 2023, FedEx returned the Division’s second RFI and TFC sent to the residence address listed in the Division’s licensing records for Rodriguez as “undeliverable.”

22. On October 30, 2023, the Division investigator attempted to contact Rodriguez by phone. The Division investigator first called the number listed in the Division’s licensing records. Once

the call connected, an automated voice recording came on and stated, “this call may be recorded for quality control purposes.” An individual then answered the call but immediately disconnected. The Division investigator called back and tried to engage the individual answering the phone, but again, the individual immediately disconnected the call without responding to the investigator. The Division investigator then attempted to call the number listed in Florida’s licensing records for Rodriguez. There was no answer, and the call went to voicemail. The Division investigator left a message for Rodriguez indicating that he was with the Division, that the Division was investigating her termination for cause, and that Iowa law required her to cooperate with the Division’s investigation. In that voicemail message to Rodriguez, the investigator requested that she return his call, but she never did so.

23. To date, Rodriguez has not responded to any of the Division’s RFIs and TFCs.

Other State Actions

24. On January 25, 2024, the state of Indiana Department of Insurance suspended Rodriguez’s Indiana nonresident insurance producer license for failure to provide a list of her appointments with insurance companies. As of the date of this filing, Rodriguez’s Indiana nonresident insurance producer license remains suspended.

25. On May 29, 2024, the state of New York Department of Financial Services and Rodriguez entered into a stipulation wherein Rodriguez agreed to a penalty in the amount of \$1,500.00, and admitted, in relevant part, that, “[she] demonstrated untrustworthiness and/or incompetence within the meaning of Section 2110(a)(4) of the Insurance Law, in that her appointment with Humana Insurance Company and its affiliates was terminated for cause for submitting an application without the consent of the beneficiary, effective September 20, 2023; . . .”

26. To date, Rodriguez has not reported either of these actions to the Division.

III. CONCLUSIONS OF LAW

COUNT I

Using Fraudulent, Coercive, or Dishonest Practices or Demonstrating Incompetence or Untrustworthiness

27. Under Iowa Code § 522B.11(1)(h), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business.

28. Rodriguez used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility when Rodriguez completed and submitted an application for insurance on behalf of J.G. without her knowledge or consent.

29. Rodriguez used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility when Rodriguez applied J.G.'s electronic signature on an application for insurance without J.G.'s knowledge or consent.

30. Rodriguez's acts and practices have been in violation of Iowa Code § 522B.11(1)(h) subjecting Rodriguez to probation, suspension, or revocation of Rodriguez's insurance producer license, the imposition of a civil penalty, an order requiring Rodriguez to cease and desist from engaging in such acts or practices, an order of restitution, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT II
Failure to Cooperate

31. Under Iowa Code § 522B.11(1)(p), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for failing or refusing to cooperate in an investigation.

32. Rodriguez failed to cooperate with an investigation by the Division regarding her termination for cause by failing to respond to the RFI and TFC the Division emailed to Rodriguez on October 9, 2023. The Division sent the email to the email addresses listed in the Division's licensing records as well as the state of Florida's licensing records for Rodriguez. The Division received no indications that the emails failed to be delivered.

33. Rodriguez failed to cooperate with an investigation by the Division regarding her termination for cause by failing to respond to the RFI and TFC the Division mailed via FedEx to the residence address listed in the state of Florida's licensing records for Rodriguez. FedEx successfully delivered the mailing, and the mailing was signed for by "L. Rodriguez."

34. Rodriguez's acts and practices have been in violation of Iowa Code § 522B.11(1)(p) subjecting Rodriguez to probation, suspension, or revocation of Rodriguez's insurance producer license, the imposition of a civil penalty, an order requiring Rodriguez to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT III
Failure to Update Address

35. Under Iowa Code § 522B.6(7) and Iowa Administrative Code rule 191—10.12(2), a licensee shall inform the Commissioner of a change of address within thirty days of the change.

36. The address provided by Rodriguez and recorded in the Division's producer licensing record for residence, mailing, and business is 5450 Bruce B. Downs Blvd. Suite 173, Wesley Chapel, Florida 33544. The RFI and TFC sent to this address were returned to the Division on October 30, 2023, as undeliverable.

37. The return of the Division's mailing to Rodriguez's Iowa licensure address of record on October 30, 2023, along with Rodriguez filing a change of address notice with Florida insurance regulators on August 17, 2024, demonstrate that Rodriguez has, since she last provided her address to the Division, changed her address at least once on or before August 17, 2024.

38. Rodriguez did not provide the Division with an updated address within 30 days of changing addresses and has not done so as of the date of this filing.

39. Rodriguez's failure to inform the Commissioner of a change in address is a violation of Iowa Code § 522B.6(7) and Iowa Administrative Code rule 191—10.12(2), subjecting Rodriguez to a civil penalty, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.17 and 505.8.

COUNT IV
Other State Action

40. Under Iowa Code § 522B.11(1)(i), a license may be subject to probation, suspension, or revocation and civil penalties may be levied, as provided in Iowa Code § 522B.17, for “[h]aving an insurance producer license, or its equivalent, denied, suspended, or revoked in any other state, province, district, or territory.”

41. On January 25, 2024, the state of Indiana suspended Rodriguez's license for failure to provide a list of her insurance company appointments. To date, Rodriguez's Indiana insurance producer license remains suspended.

42. Rodriguez's acts and practices violated Iowa Code § 522B.11(1)(i), subjecting Rodriguez to probation, suspension, or revocation of Rodriguez's insurance producer license, an order requiring Rodriguez to cease and desist from engaging in such acts or practices, the imposition of a civil penalty, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 522B.11, 522B.17, and 505.8.

COUNT V
Failure to Report Other State Action

43. Under Iowa Code § 522B.16(1), "an insurance producer shall report to the commissioner any administrative action taken against the insurance producer in another jurisdiction or by another governmental agency in this state within thirty days of the final disposition of the matter."

44. Rodriguez never reported to the Division the administrative action taken against her Indiana insurance producer license.

45. On May 28, 2024, the state of New York and Rodriguez entered into a stipulation in which she was found to have violated New York state insurance law and ordered to pay a penalty in the amount of \$1,500.00. Rodriguez never reported this action to the Division.

46. Rodriguez's failure to inform the Commissioner of the administrative actions against her in other states is a violation of Iowa Code § 522B.16(1) and Iowa Administrative Code rule 191—10.13, subjecting Rodriguez to probation, suspension, or revocation of Rodriguez's insurance producer license, an order requiring Rodriguez to cease and desist from engaging in such acts or practices, the imposition of a civil penalty, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner

deems necessary and appropriate pursuant to Iowa Code §§ 522B.17 and 505.8, and Iowa Administrative Code rule 191—10.20(4)(b).

IV. ORDER

WHEREFORE, IT IS ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code chapter 522B:

- A. Rodriguez's Iowa nonresident insurance producer license is immediately revoked pursuant to Iowa Code § 522B.11;
- B. Rodriguez, pursuant to Iowa Code § 522B.17, shall immediately cease and desist from engaging in the business of insurance in the state of Iowa;
- C. Rodriguez shall, pursuant to the payment schedule provided in paragraph E below, pay a civil penalty in the amount of \$500.00 pursuant to Iowa Code § 505.8;
- D. Rodriguez shall, pursuant to the payment schedule provided in paragraph E below, pay the amount of \$633.75 for the costs of investigation of this matter pursuant to Iowa Code § 505.8;
- E. Rodriguez shall, contemporaneously with this Consent Order, make a payment to the Division of \$200.00, and shall thereafter, on the first of each month beginning April 1, 2025, make additional payments of at least \$200.00 to the Division until the remainder of the civil penalty as ordered in paragraph C above, and the costs of investigation as ordered in paragraph D above, are paid in full. The final payment may be less than \$200.00 if that payment satisfies this judgment in total. Payments shall be made payable to the Iowa Insurance Division, to be credited to the Iowa Enforcement Fund to provide funds for insurance enforcement and education; and

NOTICE OF PENALTIES FOR WILLFUL VIOLATION OF THIS ORDER

YOU ARE NOTIFIED that acting as an insurance producer, as defined in Iowa Code chapter 522B, in violation of this Order, is a felony under Iowa Code § 507A.10, subjecting you to punishment of imprisonment, jail, fines, or any combination of custody and fines.

YOU ARE ALSO NOTIFIED that if you violate this Order, you may be subject to administrative and civil penalties pursuant to Iowa Code § 522B.17(3). The Commissioner may petition the district court to hold a hearing to enforce the order as certified by the Commissioner. The district court may assess a civil penalty against you in an amount not less than three thousand dollars but not greater than ten thousand dollars for each violation, and may issue further orders as it deems appropriate.

NOTICE REGARDING REISSUANCE

Upon entry of this Order, your insurance producer license will become inactive due to revocation. While your license is inactive, you are prohibited from conducting the business of insurance. Your license will not be active until the Division makes the determination to reissue your insurance producer license by order pursuant to Iowa Administrative Code 191—10.10. Reissuance of your insurance producer license is subject to the discretion of the Commissioner. Additionally, it will not be granted unless and until you have complied with the terms of this Order, made the appropriate Application for Reissuance with the Division, and paid all applicable fees. If applicable, you may also be required to apply for licensure through the National Insurance Producer Registry (NIPR) and pay all applicable fees.

NOTICE OF FINAL ORDER IMPACT

A final order of license revocation or a cease and desist order may adversely affect other existing business or professional licenses and may result in license revocation or disciplinary action.

A final order in an administrative action does not resolve any potential criminal or civil violations or causes of action that might arise from the same or similar conduct that is the subject of this this order. It may result in criminal law enforcement authorities, including the fraud bureau of the Iowa Insurance Division, pursuing a criminal investigation or prosecution of potential criminal law violations.

CONSENT TO ORDER AND AGREEMENT

I, Laura Rodriguez, Respondent in this matter, have read, understood, and do knowingly consent to this Order in its entirety. I understand and acknowledge I have the right to consult with an attorney on this matter if I choose to do so, and I acknowledge that the Division cannot provide me an attorney, nor can the Division provide me legal advice. By executing this Order, I understand that I am waiving my rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review.

I further understand this Order is considered a final administrative action that will be reported by the Division to the National Association of Insurance Commissioners and to other regulatory agencies. I also understand this Order is a public record under Iowa Code chapter 22 and information may be shared with other regulatory authorities or governmental agencies, pursuant to Iowa Code § 505.8(8)(d). I also understand this Order will be posted to the Division's website, and a notation will be made to the publicly available website record that administrative action has been taken against me.

Dated: 02/23/2025



Laura Rodriguez, Respondent

8608 Verova Ct, Tampa, FL, 33634
Address of Signatory

Subscribed and sworn before me by Laura Rodriguez on this 20 day of Feb, 2025.



Notary Public for the State of Florida

